fully known. There are an estimated 70,000 hazardous waste generators in California, widely ranging in size. Of these, some 22,000 as of 1984 were within TSCD's inventory for surveillance. TSCD has registered and permitted some 1300 treatment, storage, and disposal facilities, as well as 1100 haulers. Of these, the division stated that it inspected most of the treatment, storage, and disposal facilities during fiscal 1984-1985, plus more than 1900 of the generators. Critics of the division believe that many of these inspections are cursory and lack depth (Environmental Defense Fund, Berkeley, personal communication, 1985). On the other hand, some in the regulated community believe that the division and other local enforcement groups are unreasonably harsh.

During 1983-1984, some 3V2 million tons of hazardous waste were shipped off site for treatment, storage, and disposal. Most such waste eventually is hauled to seven landfill sites located in California. This immense volume of material is tracked by manifest, such that the TSCD typically receives 25,000 manifests each month—12,500 generator copies and 12,500 disposal copies; the federal form is used. A spot check in June 1985 placed the number of manifests at 27,300. A centralized computer system, with distributed terminals (there are four in the Los Angeles office, for instance) is used for entry and retrieval of the data. Field managers indicate that this record-keeping burden is extremely difficult, although of the highest practical importance. Many of the forms are filled out by people who have not filled out such forms previously, and mistakes are made and must be caught and corrected through quality control. In addition, there are lags in reporting of up to a month. Critics of the TSCD believe that the manifest system is inadequate, and incomplete, with missing data (Environmental Defense Fund, Berkeley, personal communication, 1985). Field users and managers, on the other hand, while acknowledging difficulties, feel that the system is extremely useful and is used many times each day by surveillance personnel (TSCD, Los Angeles field office, personal communication, 1985). Surveillance personnel use the retrieval capabilities of the system routinely to identify, for example, how much of waste X from counties Y and Z was hauled during a particular period to disposal site W. The retrieval function is user-friendly and driven by an understandable menu so that the working professional does not have to become a computer expert to use the system.

Inspections and spills identify violations of the law. During 1983-1984, more than 1250 violations were written by TSCD staff members. Of these, 304 had been mitigated as of the fall of 1985, 43 had been cleaned up, and legal action had commenced on 103. TSCD reports levying fines and penalties amounting to more than $850,000 under RCRA.

Field managers are frank to state that the problems they face are immense and that there are critical needs in the prevention area. One of the highest